

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

FUSION ELITE ALL STARS, et al., Plaintiffs, v. VARSITY BRANDS, LLC, et al., Defendants.	Case No. 2:20-cv-02600-SHL-tmp JURY TRIAL DEMANDED
JONES, et al., Plaintiffs, v. BAIN CAPITAL PRIVATE EQUITY, et al., Defendants.	Case No. 2:20-cv-02892-SHL-tmp JURY TRIAL DEMANDED

**DECLARATION OF DAVID SEIDEL IN SUPPORT OF PLAINTIFFS' JOINT
RESPONSE TO DEFENDANTS' MOTION TO MODIFY PREVIOUS DISCOVERY
ORDERS THAT ALLOW SHARING OF DISCOVERY MATERIALS (ECF NO. 97)
AND COORDINATION OF DEPOSITIONS (ECF NO. 172)**

I, David Seidel, declare the following under penalty of perjury:

1. I am an associate at the Joseph Saveri Law Firm, LLP (“JSLF”), counsel for Plaintiffs Jessica Jones and Christina Lorenzen (“Plaintiffs”) in *Jones, et al. v. Bain Capital Private Equity, at el.*, case no. 2:20-cv-02892-SHL-tmp. I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently.

2. At some point after Defendants filed the Motion, ECF 357, Plaintiffs became concerned that the language of Defendants’ requested relief could be interpreted much more broadly than Plaintiffs understand Defendants’ Motion to be seeking. Plaintiffs therefore reached out to Defendants to seek clarification on their requested relief.

3. On September 30, 2022, Plaintiffs discussed the issue with Defendants. Plaintiffs informed Defendants of Plaintiffs’ concern. Defendants asked Plaintiffs to send Defendants the requested relief clarified in such a way that plaintiffs would not object.

4. On September 30, 2022, the *Jones* Plaintiffs sent Defendants a proposed set of clarified modifications that the Plaintiffs would not object to.

5. On October 3, 2022, Defendants and Plaintiffs together revised the clarified set of relief such that Defendants could agree to it, and Plaintiffs would not object.

6. Attached as **Exhibit A** is a true and correct copy of email correspondence between the Plaintiffs and Defendants.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 3, 2022 in San Francisco, California.

/s/ David Seidel
David Seidel